

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA

v.

RAYMOND LEWIS DAWES, JR. R.O.

a/k/a "RAY LEW,"

a/k/a "VAINS,"

Defendant.

CRIMINAL NO. 3:13-CR-72

STATEMENT OF FACTS

The United States and the defendant, Raymond Lewis Dawes, agree that had this matter proceeded to trial, the United States would have proven the facts set forth herein beyond a reasonable doubt.

1. Between approximately July 2011 and March 2012, within the Eastern District of Virginia and elsewhere, Dawes unlawfully, knowingly, and intentionally combined, conspired, confederated, and agreed with others to distribute cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

2. Dawes is a member of the Nine Trey Gangsters ("NTG") criminal street gang, a set of the United Blood Nation.

3. NTG is organized into "line-ups." There are at least three active line-ups in Virginia. Each line-up is run by a "High Stain," a "Low Stain," and five generals. The lowest

ranking members are soldiers. The NTG line-ups report to two "Godfathers," both of whom are located in New York.

4. Dawes is a member of the Virginia-Maryland-District of Columbia line-up and holds the rank of a one-star general.

5. Dawes, and nearly every other member of the NTG, is involved in the sale of narcotics. Proceeds from those sales are often used to pay gang dues, which fund gang activities and benefit higher ranking members.

6. During portions of the conspiracy, Dawes sold approximately 14 to 21 grams of crack cocaine per week.

7. During the course of the conspiracy, Dawes also obtained some crack cocaine from another gang member and co-conspirator, H.S., for further distribution.

8. On August 21, 2012, in furtherance of the conspiracy, Dawes assisted H.S. in the sale of crack cocaine to an undercover law enforcement officer.

9. Dawes was personally involved in the distribution of, and it was reasonably foreseeable to Dawes that his co-conspirators would distribute in furtherance of the conspiracy, at least 280 grams, but less than 840 grams of crack cocaine.

10. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the government. It does not include each and every fact known to the defendant or the government, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

11. The actions of the defendant as recounted above were in all respects knowing and deliberate, and were not committed by accident, mistake, or other innocent reason.

Respectfully submitted,

Neil H. MacBride  
United States Attorney

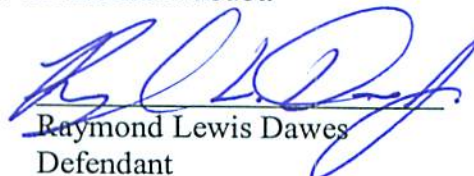
By:



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Angela Mastendrea-Miller  
Adam B. Schwartz  
Marc J. Birnbaum  
Attorneys for the United States of America

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, Raymond Lewis Dawes and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.



Raymond Lewis Dawes  
Defendant

I am counsel for Raymond Lewis Dawes. I have carefully reviewed the above Statement of Facts with the defendant. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.



Charles A. Gavin  
Counsel for Raymond Lewis Dawes